

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

SOLINA MAO, JAMES BARCLAY,  
SAMANTHA HARVEY, ANAHI ESTRADA,  
MARY ROLON, MELISSA CROXFORD,  
KAYCI STADDON, MONICA MAY, SOMMER  
FOLEY, KIMBERLY CHOURIO, PRESTON  
PARKER, SANDRA SCHLITZ, NAZARI  
CHAPPOTIN, LILIANA MORENO, BELETZA  
VAZQUEZ, AND SKYLAR HARRIS  
*individually and on behalf  
of all similarly situated individuals,*

Plaintiffs,

vs.

GLOBAL TRUST MANAGEMENT, LLC, *et al.*,

Defendants.

Civil Action No. 4:21-cv-00065-RCY-LRL

**DEFENDANTS GLOBAL TRUST MANAGERS, LLC, GLOBAL TRUST  
MANAGEMENT, LLC'S, RTC INVESTORS, LLC AND REEL TIME CAPITAL, LLC'S  
MOTION TO DISMISS**

Defendants Global Trust Managers, LLC ("GT Managers"), Global Trust Management, LLC ("GTM"), RTC Investors, LLC ("RTC") and Reel Time Capital, LLC ("Reel Time") (collectively, "Defendants") by and through their undersigned attorneys, hereby move this Court to dismiss the Amended Complaint (Dkt. 24) pursuant to Fed. R. Civ. P. 12(b)(6). In support thereof, Defendants submit their Memorandum of Law herewith.

Dated: August 26, 2021

By:

/s/ Dustin M. Paul

Dustin M. Paul (VSB No. 75287)

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*Counsel for Defendants Global Trust Managers,  
LLC, Global Trust Management, LLC, RTC  
Investors, LLC and Reel Time Capital, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of August, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/Dustin M. Paul  
Dustin M. Paul (VSB No. 75287)

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